



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 17, 2015

CHAIRMAN RANAE LENTZ, TREASURER
OHIO REPUBLICAN PARTY STATE CENTRAL
& EXECUTIVE COMMITTEE
211 S. FIFTH STREET
COLUMBUS, OH 43215

Response Due Date
04/21/2015

IDENTIFICATION NUMBER: C00162339

REFERENCE: YEAR-END REPORT (11/25/2014 - 12/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A of your Year-End Report (11/25/14 - 12/31/14) discloses transfers totaling \$14,524.11 from "SENATE BATTLEGROUND FUND" which appears to be your committee's share of the gross contributions received through joint fundraising efforts. However, "SENATE BATTLEGROUND FUND" does not appear as a joint fundraising representative on your Statement of Organization. Please clarify this discrepancy.

In addition, Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser(s). The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. Please amend your report by providing the omitted memo schedule(s). 11 CFR §102.17(c)(8)(i)(B)

2. Schedule H4 supporting Line 21(a) of your report discloses payments for "Employer tax disabled employee - not candidate specific," "Payroll, taxes and fees - not candidate specific," and "Payroll, taxes, fees - not candidate specific." Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time

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in a given month on Federal Election Activity (FEA) or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on FEA or activities in connection with a Federal election. If this is not the case, any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding any improper allocation activity, your prompt action will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

Sincerely,



Brian Jones
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division